## **EXHIBIT A**



**PRESS RELEASE** 

## Former Professor Charged With Obstructing Justice By Falsifying Records

Tuesday, May 21, 2024

## For Immediate Release

U.S. Attorney's Office, Southern District of New York

Damian Williams, the United States Attorney for the Southern District of New York, and James Smith, the Assistant Director in Charge of the New York Field Office of the Federal Bureau of Investigation ("FBI"), announced today the filing of a Criminal Information charging MATTHEW QUEEN with falsification of records in connection with falsified notes Queen produced to the FBI related to an ongoing federal investigation. QUEEN was arraigned on the Information before U.S. District Judge Lewis Kaplan earlier today.

U.S. Attorney Damian Williams said: "As alleged, Matthew Queen attempted to interfere with a federal grand jury investigation by creating false notes in an attempt to corroborate his own lies. The criminal obstruction charge announced today should exemplify the seriousness of attempts by any individual to manipulate or interfere with a federal investigation."

FBI Assistant Director in Charge James Smith said: "Matthew Queen, an interim Provost, allegedly failed to inform the FBI of a conspiracy to destroy evidence related to the ongoing investigation of sexual misconduct and instead produced falsified notes to investigators. Queen's alleged actions deliberately violated a court order and delayed justice for the sexual abuse victims. The FBI will never tolerate those who intentionally lie and mislead our investigation in an attempt to conceal their malicious behavior."

According to the allegations in the Information filed today in Manhattan federal court and other public statements made in court:[1]

Since approximately 2022, the U.S. Attorney's Office for the Southern District of New York ("U.S. Attorney's Office") and the FBI have been investigating allegations of sexual abuse and misconduct related to a national religious denomination (the "Denomination") and its affiliated entities, and the alleged cover-up of such allegations by individuals and entities associated with the Denomination. In October 2022, as part of that investigation, a grand jury subpoena was issued to a seminary that is affiliated with the Denomination (the "Seminary). Among other things, the subpoena required the production of all documents in the Seminary's possession related to allegations of sexual abuse against anyone employed by or associated with the Seminary.

The following month, in November 2022, a Seminary employee ("Employee-1") received a report alleging that a current Seminary student had committed sexual abuse. Employee-1 immediately notified the campus police at the Seminary. No further action was taken by the Seminary at that time, however, and the allegation was not reported to the U.S. Attorney's Office.

In January 2023, Employee-1 created a document describing the sexual abuse allegation Employee-1 received in November 2022, and the failure of the Seminary to take action regarding the allegation at that time (the "Document"). On January 26, 2023, Employee-1 met with MATTHEW QUEEN, the then-Interim Provost and professor at the Seminary, and a member of the Seminary's executive staff ("Employee-2"). During that meeting, and in QUEEN's presence, Employee-2 directed Employee-1, in sum and substance, to destroy the Document.

In May 2023, the U.S. Attorney's Office and the FBI interviewed MATTHEW QUEEN in Fort Worth, Texas regarding the January 26, 2023 meeting with Employee-2 and Employee-1. During that interview, QUEEN falsely stated that he had not heard Employee-2 direct Employee-1 to destroy the document. Three days after the interview, QUEEN falsely stated to another Seminary employee ("Employee-3") that he had just located a notebook in his office containing purportedly contemporaneous notes of the January 26, 2023 meeting. The notes falsely stated that during the January 26, 2023 meeting, Employee-2 and Employee-1 merely discussed providing the Document to a different department at the Seminary, and omitted the fact that Employee-2 had directed Employee-1 to destroy the Document. Queen provided the falsified notes to Employee-2 to produce in response to the grand jury subpoena.

In June 2023, MATTHEW QUEEN provided the U.S. Attorney's Office with a copy of his notes. On June 20, 2023, QUEEN met again with the U.S. Attorney's Office and the FBI in New York and produced the original notebook containing his notes. During his second interview, QUEEN initially falsely stated that he had written the notes contemporaneously with the January 26, 2023 meeting, but then during the same meeting, QUEEN falsely stated that he instead had written the notes months later, in April 2023. In truth and in fact, QUEEN had written the notes following his initial May 2023 interview with the U.S. Attorney's Office and the FBI.

On June 21, 2023, MATTHEW QUEEN testified under oath that he had in fact heard Employee-2 direct Employee-1 to make the Document "go away."

QUEEN, 49, of Greensboro, North Carolina, is charged with one count of falsification of records, which carries a maximum sentence of twenty years in prison.

The maximum potential sentence in this case is prescribed by Congress and is provided here for informational purposes only, as any sentencing of the defendant will be determined by a judge.

Mr. Williams praised the outstanding investigative efforts of the FBI. He added that the investigation is ongoing.

The prosecution of this case is being handled by the Office's Civil Rights Unit in the Criminal Division. Assistant U.S. Attorney Jacqueline Kelly is in charge of the prosecution.

The charges contained in the Information are merely accusations, and the defendant is presumed innocent unless and until proven guilty.

[1] As the introductory phrase signifies, the entirety of the text of the Indictment, and the description of the Indictment set forth herein, constitute only allegations, and every fact described should be treated as an allegation.

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